

Plaintiff's response to Defence's Response to
Plaintiff's Response to Defence's Motion for
summary Judgment.

The defence wishes to manipulate and deceive
this court by false accusations against the plaintiff.
The facts pertaining to this case are as follows:

1. Anyone knows that it is inappropriate for Corrections
Staff, Law Enforcement, and even civilians to grab
a woman's breast, no matter how brief, no matter
what excuse the offender gives, and no matter
whether or not the woman is Cisgender-female
or transgender-female. Grabbing breasts, buttocks, or
genitalia of anyone, including inmates, is Sexual Assault.

2. The Video of the incident at gate 35, in CRCC,
on 9/6/18, clearly shows Jerry Wonders' black gloved
hand on my left breast, therefore as fact #1, which
is based on U.S. Federal and State laws, shows that
yes regardless of how long Jerry Wonders, Sexually
Assaulted me, he still Sexually Assaulted me.

3. Of the 18-34 pat searches, C/O's Wonders
and Nissen performed, only on 2 occasions
that I was searched (8/22/18 and 9/6/18)

~~the~~ these C/O's confiscated something that they
(Nissen + Wonders) considered Contraband

these items were: 2 Jolly Rancher Candies, and 1 ziplock bag of coffee on 8/22/18, 1 state issued ball-point pen on 9/6/18. These searches only yielded literally a handful of items, so the Claim of Jerry Wonders (Wonders Decl.) ¶¶ 9, 5 "... Martin always had something Martin wasn't supposed to have..." or of Shawna Nissen (Nissen Decl.) ¶¶ 9, 4, and Javier Lagunas (Lagunas Decl.) ¶¶ 9, 4, these claims are contradicted by my Behavior Observation Entry's, and CRCC cameras.

4. Defendants make a false claim when stating, that the Searches C/O's Nissen and Wonders performed, ~~was~~ furthered penological objectives, is contradictory to ~~actually~~ actual penological objective and policy. Policy states that when Staff confiscates any item from inmates they must file a property disposition form; Policy also states that Negative behavior needs to be logged into the inmates Behavior Observation Entry (BOE) file, and that the inmates counselor is to address the situation reported in the BOE with the inmate.

With these 4 facts and explanations given objectively, I ask the court please watch the video previously mentioned, if this court determines that this search is not inappropriate I'll accept the consequence, but I'll question the courts objectivity. If this court

finds that they agree that defendant Wonders indeed was inappropriate, I pray this court hold the defence accountable for their actions.

Respectfully submitted this 3rd day of April 2020.

Signed Lillian R A Martin
Lillian R. A. Martin